

Exhibit 13

Brian Campbell

From: Jeffrey Miller <jeffreymiller@quinnmanuel.com>
Sent: Tuesday, September 10, 2024 4:47 PM
To: Brian Campbell; Chiang, May; Alexandra Sadinsky; Levander, Andrew; Black, Martin; Strong, Ryan; Rollo Baker; Vivek Tata; Roberts, Daniel; Kateryna Shokalo; Shams Hirji; Park, Hayoung
Cc: QE Jane Street; Jeff Nardinelli; Greg Miraglia
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL]

Counsel,

Thank you for speaking with us yesterday. We are writing to confirm the next steps the parties agreed to:

By Thursday, the parties will:

- Provide an update on their investigations into what structured data sources they plan to collect and produce and the relevant data contained in those sources;
- Provide an update into what PNL data is stored in the ordinary course of business by Jane Street and Millennium, including as to whether Millennium tracks “Trade PNL” data as part of its ordinary course; and
- Defendants will confirm their position regarding supplementing their pre-Schadewald trading data production.

Additionally, by the end of the week, Jane Street confirmed it will respond in writing to Defendants’ letter regarding Interrogatory No. 3 and provide additional details regarding its collection of J: drive documents, as well as address other matters in Mr. Campbell’s recent e-mail.

Further, on our call, you confirmed you would be collecting and producing responsive documents from Mr. Schadewald’s team’s Wiki, Confluence, and OneNote. We note that you wrote on July 26, and reiterated on August 13, that you were “exploring how to capture th[ose] database[s]”, including a Sharepoint database used by Mr. Schadewald’s teams. To date, you have not disclosed how you plan on capturing the data from Millennium’s Sharepoint, Wiki, Confluence, or OneNote databases.

Plaintiff has been very clear in how it was collecting from its [REDACTED] and Google Document sources, and those collections have been the subject to ongoing discussions between the parties. We expect reciprocity from Defendants. Please explain this week how Millennium is collecting, searching, and reviewing the above four databases, plus any other databases it has discovered are being used by Mr. Schadewald’s team for India options trading.

Finally, to the extent Mr. Schadewald’s Wiki (or Confluence or OneNote or other database) is primarily concerned with the development and implementation of India options trading at Millennium, we would expect the entire database to be responsive and produced, as it is stored in the ordinary course of business (*i.e.*, as a functioning Wiki). Please confirm whether this is your plan and, if not, why not.

Best,
Jeff

From: Greg Miraglia <gregmiraglia@quinnmanuel.com>
Sent: Saturday, September 7, 2024 1:27 PM
To: Brian Campbell <BCampbell@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <qejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

Counsel,

Please also be prepared to discuss the 11 enumerated document deficiencies as described in emails from myself and J. Miller this week.

We will send an invite for 3:30 ET.

Best,

Greg

From: Brian Campbell <BCampbell@elsberglaw.com>
Sent: Friday, September 6, 2024 10:37 AM
To: Greg Miraglia <gregmiraglia@quinnmanuel.com>; Chiang, May <May.Chiang@dechert.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <qejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from bcampbell@elsberglaw.com]

Counsel for the defendants are available on Monday after 2:30 ET. In addition, per my Sept. 4th email and our Aug. 29th letter, on this call we expect to meet and confer regarding Jane Street's deficient interrogatory responses unless Jane Street agrees today to remedy the deficiencies as requested.

Thanks,
Brian

From: Greg Miraglia <gregmiraglia@quinnmanuel.com>
Sent: Thursday, September 5, 2024 4:47 PM
To: Chiang, May <May.Chiang@dechert.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <qejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Subject: Re: JS v. Millennium - mutual production of trading data

Counsel,

Please provide your availability to meet and confer regarding the parties' production of PNL data, as well as item No. 3 below, this Monday.

Thank you kindly,

Greg

From: Chiang, May <May.Chiang@dechert.com>

Sent: Wednesday, September 4, 2024 12:58 PM

To: Greg Miraglia <gregmiraglia@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>

Cc: QE Jane Street <gejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>

Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from may.chiang@dechert.com]

Highly Confidential, Attorneys and Individual Defendants Only

Counsel – we again dispute the notion that our trading data production was deficient or that Jane Street has suffered any prejudice. Nevertheless, we have considered your requests and provide the following responses:

We will provide a replacement for MLP-JS-0000001 (SOCAP's trading data) that includes a new column for buy/sell and order ID on the last tab of the spreadsheet. We expect to produce the updated spreadsheet by the end of this week.

We are in the process of collecting fill data for SACP. We expect to produce the fill data to you early next week assuming the collection goes as planned.

We decline to provide fill data for the pre-Schadewald trading teams (MLP-JS-0000002). Such data goes beyond the Court's order and is not relevant to Jane Street's trade secret misappropriation claims. If you wish to meet and confer on this issue, we can be available later this week.

With respect to PNL data, Jane Street has repeatedly asserted that its compensatory damages claim is tied to an alleged loss of trading profits. It is difficult to understand how Jane Street can maintain that position given the large profits it has reaped through India options trading over the last few months, but that is a question we will address to the Court later.

If Jane Street wants to maintain a lost profits damages claim, it needs to provide the alleged support. So far, Jane Street has cited monthly summary PNL data in response to Interrogatory No. 2. We are entitled to discovery of the constituent data, which includes daily data and anything more granular in your possession. We understand that [REDACTED], and we request production of the PNL data in the form Jane Street keeps the data in the ordinary course, [REDACTED]. Please advise us by the

close of business tomorrow whether Jane Street will produce the PNL data (1) on a daily basis and (2) on an intraday basis in the form the data is kept at Jane Street. If you refuse to commit to providing both of these data sets by no later than Monday, please provide a time to meet and confer this week.

More generally, we find the refusal of Jane Street to provide this data deeply troubling. Unlike the detailed trade by trade data the parties are exchanging, which is both voluminous and more complex to extract, there is simply no excuse for Jane Street's refusal to provide the underlying PNL data. If you fail to produce the material promptly, we will move the court to exclude Jane Street's damages case. Jane Street cannot rely on summary monthly data without providing the underlying data, and the failure to produce this basic information has been prejudicial to our preparation of the case.

May Chiang
Partner

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From: Greg Miraglia <gregmiraglia@quinnmanuel.com>
Sent: Friday, August 30, 2024 11:31 AM
To: Chiang, May <May.Chiang@dechert.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <gejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL]

Counsel,

Regarding Defendants' deficient trading production: Usable trading data, i.e., that produced with necessary information such as buy/sell designations, is fundamental to the issues in this case. We understand that Defendants are considering providing this information and will "revert" back to Jane Street. In order to prevent further delay, which is already prejudicial to Jane Street, please immediately provide a date certain on which this data will be provided, or your availability to M&C today, or Tuesday or Wednesday of next week.

Regarding PNL data: Please provide the relevance and basis for your demand for PNL data on a daily basis.

Thank you kindly,

Greg

From: Chiang, May <May.Chiang@dechert.com>
Sent: Thursday, August 29, 2024 11:08 AM
To: Greg Miraglia <gregmiraglia@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra

Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
 Cc: QE Jane Street <gejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
 Subject: Re: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from may.chiang@dechert.com]

Counsel – we are considering Jane Street’s request to provide fill data and will determine whether your requested fields are kept in the ordinary course. We dispute your contention that our trading data production was somehow deficient when the parties did not discuss exchanging fill data on the August 16, 2024 meet/confer. And with respect to the pre-Schadewald trading data, the Court has already ordered that Millennium provide what it offered Jane Street, which is reproduced below:

Raw trading data showing orders with average execution price for non-Schadewald teams that report up to [REDACTED] from 1/1/2023 to 6/30/2024.

That is what we produced with respect to the pre-Schadewald trading period.

Nevertheless, we are considering your requests regarding fill data and updates to the produced spreadsheets, and will revert.

We did not see a response yesterday on our request for daily PNL, please advise.

May Chiang
 Partner

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From: Greg Miraglia <gregmiraglia@quinnmanuel.com>
Sent: Tuesday, August 27, 2024 6:29 PM
To: Chiang, May <May.Chiang@dechert.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <gejanestreet@quinnmanuel.com>; Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL]

Counsel,

Bumping up Jeff's request below. Millennium's failure to provide complete and usable trading data must be rectified immediately – the current production (MLP-JS-0000001) does not even differentiate between sell and buy orders.

Confirm that Millennium is doing so and provide a date certain for its production.

Note, we are investigating your daily PNL request and will revert EOD tomorrow with a response.

Greg

From: Chiang, May <May.Chiang@dechert.com>

Sent: Friday, August 23, 2024 1:17 PM

To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>

Cc: QE Jane Street <qejanestreet@quinnmanuel.com>

Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from may.chiang@dechert.com]

Jeff, thanks for your email. We will address the other issues separately and will also revert on your request regarding Millennium's trading data, but one issue should be easy to resolve. JS00247223 has the monthly P&L data and was obviously pulled from a larger database. Pursuant to our prior request, please provide the same spreadsheet with daily data as soon as possible.

May Chiang
Partner

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From: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>

Sent: Friday, August 23, 2024 10:40 AM

To: Brian Campbell <BCampbell@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>

Cc: QE Jane Street <qejanestreet@quinnmanuel.com>

Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL]

Hi Brian,

Thanks for your email. To your first point, we produced the full trading data. If you have any issues with the trading data production, let us know.

Regarding structured databases, as you are aware, the parties have been actively discussing this issue. Specifically, we have advised on many occasions the difficulty with collecting and producing from structured databases and have advised that it is our understanding that much of information contained in these databases is cumulative of information found elsewhere. Nonetheless, we are willing to discuss this issue further with Defendants to see if there is a way to resolve this. Note—consistent with previous discussions—any collection and production from structured databases will need to be mutual and Millennium will need to agree to collect and produce from the structured databases that Mr. Schadewald and his team use. Per Ms. Chiang's August 13 email, we understand that Millennium is still exploring that issue. Moreover, we will look into the spreadsheet and tables you referenced and into whether it is possible to collect and produce those two items. We disagree however with your comment about "limited visibility" given that your clients are former Jane Street traders familiar data sources relating to the claimed trade secrets.

Finally, regarding the PNL data, we provided a verified rog response describing the data produced at JS00247223, including what it is and where it is from.

Best,
Jeff

From: Brian Campbell <BCampbell@elsberglaw.com>
Sent: Wednesday, August 21, 2024 1:23 PM
To: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; Chiang, May <May.Chiang@dechert.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <qejanestreet@quinnemanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from bcampbell@elsberglaw.com]

Jeff,

Following up on our call on 8/16, we understand that the trading data production does not contain significant parts of the information subject to our requests, which we expect may be located in other structured data sources.

Our Requests for Production identified databases as one of the forms of electronically stored information subject to our RFPs. We also identified databases as a source of potentially relevant information that we asked Jane Street to capture in our June 27th search parameter proposal. Apart from the trading data being exchanged this week, has Jane Street investigated to determine what databases or other sources of structured data exist that contain relevant information? Based on the investigation, are there any other structured data sources from which Jane Street intends to produce relevant information?

While we do not expect that all structured data sources of responsive information will necessarily need to be produced, we have identified at least a handful of Jane Street structured data sources that appear to contain important and responsive information. We understand from the 8/16 call and our review of the production that the information in these sources is not reflected in the trading data.

1. A spreadsheet called [REDACTED], which at least as of Feb. 2024, appears to have resided here: [REDACTED]). We understand that this

file pulls data from one or more structured data sources (JS00202431). We think this file (and potentially the sources it draws from) should be produced and care should be taken to ensure that it remains usable.

2. Database tables [REDACTED]).

We expect that there may be other structured data sources in Jane Street's possession that contain relevant and important information, but as of now we have limited visibility and are reliant on your good faith investigation efforts to determine what those sources might be.

We would like to understand what data is contained in these structured data sources and what options are available to Jane Street to export the relevant data in a usable format (whether that be exporting data as a csv, using queries to export a subset of the information, generating a report, or some other method). I expect the parties can agree on which data should be captured and the format that the export takes.

Additionally, we inquired on our 8/16 call what the sources were for the "PNL Data" produced by Jane Street on 7/31. You were unsure. We reiterate our request that Jane Street identify the structured data sources of PNL information related to its India Options Trading. We assume that the source of PNL information used by Jane Street in the ordinary course is the same as the source for the figures in the Nanney Declaration and in the document produced on 7/31, but to the extent there are multiple sources, we want to understand that. Same as above, we want to understand what data exists, what export capabilities exist, and I expect we can agree on which data will be captured and the format it will take.

Thanks,
Brian

From: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Sent: Friday, August 16, 2024 1:28 PM
To: Chiang, May <May.Chiang@dechert.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <gejanestreet@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

Ah, yes. Thanks for the correction. Agreed.

From: Chiang, May <May.Chiang@dechert.com>
Sent: Friday, August 16, 2024 12:24 PM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <gejanestreet@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from may.chiang@dechert.com]

Thanks, Jeff – just one clarification to your email, our request was for daily PNL data. We will follow up separately with the name/address for the hard drive.

From: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>
Sent: Friday, August 16, 2024 3:06 PM
To: Chiang, May <May.Chiang@dechert.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <gejanestreet@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL]

Hi May,

Thanks for the call today. As discussed, both sides will produce their raw trading data on Monday, August 19. The trading data is for the time period 1/1/2023 through 6/30/2024. At some later time, the parties will discuss supplementing with more recent data. Millennium also agreed to produce its PNL data on August 19. Millennium requested that Jane Street produce daily trading data—our prior production was monthly—and I agreed to look into that and get back to you.

Also as discussed, Jane Street will be producing its trading data on a physical hard drive. Please give us a name and address to send the drive to.

Best,
Jeff

From: Chiang, May <May.Chiang@dechert.com>
Sent: Thursday, August 15, 2024 11:55 AM
To: Jeff Nardinelli <jeffnardinelli@quinnmanuel.com>; Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>; Park, Hayoung <Hayoung.Park@dechert.com>
Cc: QE Jane Street <gejanestreet@quinnmanuel.com>
Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL from may.chiang@dechert.com]

We would like to meet and confer tomorrow on trading data format and what will be provided, and both the Dechert and EBM teams are available tomorrow afternoon 2:30-4 pm ET. If that time doesn't work for Quinn, let's look for a time Monday. Millennium can agree to a mutual production of trading data Tuesday or Wednesday next week. On the meet and confer, we would like to discuss production of PNL data on a daily basis.

Thanks,

May Chiang
Partner

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From: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>

Sent: Thursday, August 15, 2024 1:48 PM

To: Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>

Cc: QE Jane Street <gejanestreet@quinnemanuel.com>

Subject: RE: JS v. Millennium - mutual production of trading data

[EXTERNAL EMAIL]

Counsel, we would appreciate your response by EOD today.

Thanks,
Jeff

From: Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>

Sent: Wednesday, August 14, 2024 8:54 AM

To: Brian Campbell <BCampbell@elsberglaw.com>; Alexandra Sadinsky <ASadinsky@elsberglaw.com>; Chiang, May <May.Chiang@dechert.com>; Levander, Andrew <andrew.levander@dechert.com>; Black, Martin <martin.black@dechert.com>; Strong, Ryan <Ryan.Strong@dechert.com>; Rollo Baker <rbaker@elsberglaw.com>; Vivek Tata <vtata@elsberglaw.com>; Roberts, Daniel <Daniel.Roberts@dechert.com>; Kateryna Shokalo <kshokalo@elsberglaw.com>; Shams Hirji <SHirji@elsberglaw.com>

Cc: QE Jane Street <gejanestreet@quinnemanuel.com>

Subject: JS v. Millennium - mutual production of trading data

Counsel,

Notwithstanding the recent extension, Jane Street has been preparing to produce its trading data in line with the previous case schedule. As you know, trading data is critically relevant to liability and damages issues in this case. Jane Street proposes a mutual production of trading data this coming Monday, August 19. We also propose that Millennium produce its PNL data by August 19; Jane Street produced its PNL data on July 31. If Defendants do not agree to a mutual August 19 production, Jane Street requests a meet and confer this Friday, August 16 to discuss.

Thanks,
Jeff

Jeff Nardinelli
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